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April 15, 2019

VIA ELECTRONIC MAIL

Ms. Diane Salkie
ATTN: Lower Passaic River Remedial Project Manager
Emergency and Remedial Response Division
U.S. EPA, Region 2
290 Broadway, 19th Floor
New York, New York 10007

**Re: *Monthly Progress Report No. 143 – March 2019*
 Lower Passaic River Study Area (LPRSA) Remedial Investigation/Feasibility Study
 (RI/FS)
 *CERCLA Docket No. 02-2007-2009***

Dear Ms. Salkie:

de maximis, inc. is submitting this Monthly Progress Report for the above-captioned project on the behalf of the RI/FS Agreement Settling Parties (Cooperative Parties Group or CPG) pursuant to the Administrative Settlement Agreement and Order on Consent (Settlement Agreement or AOC). The Progress Report satisfies the reporting requirements of Paragraph 42 of said Settlement Agreement. The CPG has revised this Progress Report to address the Region's direction in its September 1, 2015 letter about Section (d).

(a) Actions which have been taken to comply with this Settlement Agreement during the previous month.

Meetings/Conference Calls

- On March 7, EPA Region 2 (Region 2), CPG, and New Jersey Department of Environmental Protection (NJDEP) held a meeting to discuss the Upper 9-Mile Interim Remedy (IR) Feasibility Study (FS).
- On March 12, Region 2, CPG and NJDEP held a FS Subcommittee teleconference to discuss approaches to post-IR completion confirmation.
- On March 19, Region 2 and CPG modeling consultants held a teleconference to confirm Upper 9-Mile IR FS modeling projection approach details.
- On March 21, Region 2, CPG, and NJDEP held a meeting to discuss the Upper 9-Mile IR FS and Current Conditions Sampling.

Ms. D. Salkie
LPRSA RI/FS - Progress Report No. 143 – March 2019
April 15, 2019
Page 2 of 5

Correspondence

- On March 4, Region 2 requested a schedule for the River Mile (RM) 10.9 poling and sediment sampling activities from CPG.
- On March 4, CPG provided Region 2 the Upper 9-Mile IR FS Work Plan Addendum.
- On March 5, Region 2 provided an agenda for the Upper 9-Mile FS meeting scheduled for March 7, 2019 to CPG.
- On March 5, CPG notified Region 2 of a delay in providing revised Appendix K of the Draft 17-Mile Remedial Investigation (RI) Report and requested an agenda for the scheduled March 12, 2019 FS Subcommittee teleconference to discuss post-IR monitoring approaches and issues.
- On March 5, CPG provided an updated schedule for the Upper 9-Mile Bathymetry Survey to Region 2 consultants.
- On March 5, Region 2 provided comments on Appendix Q of the 17-Mile Baseline Ecological Risk Assessment (BERA) to CPG.
- On March 5, CPG provided suggested changes to the February 7, 2019 Upper 9-Mile FS meeting minutes to Region 2.
- On March 6, CPG uploaded revised maps from Appendix K of the revised Draft 17-Mile RI Report to EPA's SharePoint site.
- On March 7, Region 2 provided a list of action items to CPG from the Upper 9-Mile IR FS meeting.
- On March 8, CPG and Region 2 exchanged emails regarding potential time frames for discussing current condition sampling in the Upper 9-Miles.
- On March 8, Region 2 provided CPG a letter memorializing decisions made for the footprint analysis of the Upper 9-Mile FS.
- On March 8, Region 2 provided CPG call-in information and an agenda for the March 12, 2019 Upper 9-Mile FS Subcommittee meeting.
- On March 11, Region 2 confirmed that they would accept bootstrap methods to derive confidence intervals for the 17-Mile RI Report Section 10.5 data to CPG.
- On March 11, Region 2 and CPG exchanged emails regarding scheduling a teleconference to discuss the status of the Bioaccumulation Model (Food Web Model, FWM).
- On March 11 and 12, Region 2 and CPG consultants exchanged emails regarding scheduling a teleconference to discuss the Newark Bay Study Area (NBSA) Contaminant Fate and Transport (CFT) Model calibration documentation.
- On March 12, Region 2 provided comments on the Upper 9-Mile IR FS evaluation metrics file to CPG.
- On March 12, Region 2 provided an agenda for the March 21, 2019 Upper 9-Mile IR FS and current conditions sampling meeting to CPG.
- On March 14, CPG provided papers requested as part of the Upper 17-Mile BERA Appendix Q comments to Region 2.
- On March 15, CPG delivered the February Monthly Progress Report to Region 2.

Ms. D. Salkie
LPRSA RI/FS - Progress Report No. 143 – March 2019
April 15, 2019
Page 3 of 5

- On March 18, Region 2 requested additional information regarding CPG's request to speak with Region 2's consultant on aspects of comments on the Water Column Monitoring Summary reports.
- On March 18, Region 2 requested the Single Beam Bathymetry Line Plan for the Upper 9-Mile Bathymetry Survey from CPG to review and additional information regarding the schedule for the RM 10.9 poling activities to be conducted in conjunction with the Bathymetry Survey activities.
- On March 18, CPG provided schedule and personnel contact information to Region 2 for the Bathymetry Survey and RM 10.9 poling activities to Region 2.
- On March 18, Region 2 and CPG exchanged emails regarding scheduling a teleconference on March 19 to discuss the Upper 9-Mile IR FS modeling approach.
- On March 19, CPG requested Region 2's review of the papers requested as part of the Upper 17-Mile BERA Appendix Q comments provided on March 14, 2019.
- On March 19, Region 2 and CPG exchanged emails regarding 17-Mile BERA Appendix Q response to comments.
- On March 20, CPG provided potential dates/times to Region 2 to schedule a teleconference on the FWM calibration status.
- On March 20, Region 2 provided information for the Physical Water Column Monitoring (PWCM) report comments to CPG.
- On March 20, CPG provided responses to comments (RTCs) received February 26, 2019 on the revised Draft 17-Mile Small Volume (SV) Chemical Water Column Monitoring (CWCM) Sampling Program Characterization Summary and revised text, tables and appendices.
- On March 20, CPG provided RTCs received February 26, 2019 on the revised Draft 17-Mile High Volume (HV) CWCM Sampling Program Characterization Summary and revised text, tables and appendices.
- On March 21 and 22, CPG and Region 2 exchanged emails confirming April 15, 2019 for a teleconference on the FWM calibration status.
- On March 22, CPG provided RTCs received February 26, 2019 on the Draft 17-Mile PWCM Sampling Program Characterization Summary and revised text and table.
- On March 25, CPG notified Region 2 that Phase 2 of the Upper 9-Mile Bathymetry Survey was completed on March 24.
- On March 25, Region 2 provided additional comments on Appendix Q of the 17-Mile BERA to CPG.
- On March 25, Region 2 and CPG exchanged emails regarding Region 2 comments on the revised Draft 17-Mile RI Report.
- On March 26, CPG provided a draft Table of Contents (TOC) for the Upper 9-Mile IR FS to Region 2.
- On March 27, Region 2 and CPG exchanged emails regarding delaying submission of revised Draft Upper 17-Mile RI Report Section 9 and the BERA Appendix Q.
- On March 27, CPG provided Region 2 a list of documents submitted previously to verify the status of approvals.

Ms. D. Salkie

LPRSA RI/FS - Progress Report No. 143 – March 2019

April 15, 2019

Page 4 of 5

- On March 27, CPG informed Region 2 that it was still working on responses to comments on the Modeling Guardrails document (*Regarding the Use and Limitations of Model Projections in Evaluating and Comparing Remedial Alternatives in the IR FS*).
- On March 27, CPG provided draft Applicable or Relevant and Appropriate Requirements (ARARs) for the Upper 9-Mile IR FS to Region 2.
- On March 28, Region 2 provided a meeting invitation and agenda for the scheduled April 4 Current Condition Sampling meeting for the Upper 9-Miles to CPG.
- On March 28, CPG provided the final Upper 9-Mile IR FS Metrics to Region 2.
- On March 29, CPG uploaded the text (excluding Section 9), tables, and figures, and Appendices A, F, G, H, I, J, K, L, N, O and AA of the final revised Draft 17-Mile RI Report to EPA's SharePoint site.

Work

- CPG continued work to address Region 2's comments on the revised Draft 17-Mile RI Report and Model Appendices.
- CPG revised the Draft Upper 9-Mile IR FS Work Plan Addendum.
- CPG continued to develop Upper 9-Mile IR FS supporting documents.
- CPG initiated modeling projections for the Upper 9-Mile IR FS.
- CPG completed the bathymetric and side scan sonar data collection for the Upper 9-Mile Bathymetry Survey; poling of the RM 10.9 Removal Area cap also completed.
- CPG continued work on revision and calibration of the LPR FWM.

(b) Results of Sampling and Tests

- None.

(c) Work planned for the next two months with schedules relating to the overall project schedule for RI/FS completion

- CPG will continue work on the outstanding portions of the revised Draft 17-Mile RI Report and Model Appendices in response to Region 2 comments. Appendix P (Bioaccumulation Modeling) has been partially revised, but additional work on calibration issues is required to complete the revision.
- CPG will continue to support HDR's review of the calibration of the LPR/Newark Bay CFT Model.
- CPG will continue revising and calibrating the LPR Bioaccumulation Model pursuant to Region 2 comments.
- CPG will continue work on Newark Bay Model documentation.
- CPG will continue participation in meetings and conference calls with Region 2 and NJDEP and initiate drafting the Upper 9-Mile IR FS Addendum.
- CPG will continue modeling projections for the Upper 9-Mile IR FS.

Ms. D. Salkie
LPRSA RI/FS - Progress Report No. 143 – March 2019
April 15, 2019
Page 5 of 5

- CPG will complete collection of ground truthing samples for the side scan sonar survey component of the Upper 9-Mile Bathymetry Survey.
- CPG will initiate processing of Upper 9-Mile Bathymetry Survey data.

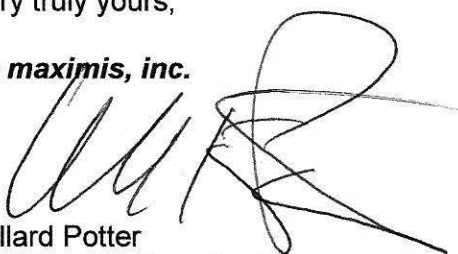
(d) Problems encountered and anticipated problems, actual or anticipated delays, and solutions developed and implemented to address actual or anticipated problems or delays.

- Other Documents – Region 2 and CPG are working on finalizing the outstanding documents.

If you have any questions, please contact Rob Law or me at (908) 735-9315.

Very truly yours,

de maximis, inc.


Willard Potter
CPG Project Coordinator

cc: Frances Zizila, EPA Region 2 Office of Regional Counsel
William Hyatt, CPG Coordinating Counsel
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